

JAP:MKM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

12 M 558

- - - - -X

UNITED STATES OF AMERICA

- against -

LUIS ANGEL MUNOZ,

Defendant.

PRE-ARRAIGNMENT

C O M P L A I N T

(21 U.S.C. §§ 952(a)  
and 960)

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

TAMIKA COMRIE, being duly sworn, deposes and says that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 5, 2012, within the Eastern District of New York and elsewhere, defendant ROBERT MARTINEZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

---

<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On June 5, 2012, defendant LUIS ANGEL MUNOZ arrived at John F. Kennedy International Airport in Queens, New York, aboard Jet Blue Airlines Flight No. 838 from Santiago, Dominican Republic.

2. The defendant LUIS ANGEL MUNOZ was selected for a Customs and Border Protection ("CBP") examination of his luggage. CBP officers conducted an inspection of the defendant's luggage, as well as a pat-down search, both of which yielded negative results.

3. The defendant was presented with an x-ray consent form, which he read, appeared to understand and signed. A subsequent x-ray read positive for foreign bodies in the defendant's intestinal tract.

4. Thereafter, the defendant passed two pellets containing a tan powdery substance, which field-tested positive for the presence of heroin. The defendant was placed under arrest.

5. The defendant LUIS ANGEL MUNOZ will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that  
defendant LUIS ANGEL MUNOZ be dealt with according to law.

A handwritten signature in black ink, appearing to read 'TAC', is written over a horizontal line.

TAMIKA COMRIE  
Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
5th day of June, 2012

\_\_\_\_\_  
HONORABLE JOAN M. AZRACK  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK